

EXHIBIT A

Attorney of Record: James M. Curran, Esq.
N.J. Attorney ID # 028631984
Filing Attorney: James M. Curran, Esq.
LAW OFFICE OF JAMES M. CURRAN, P.C.
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Milltown, NJ 08850
(732) 296-0500
Fax: 732-296-9090
Attorney for Plaintiff, Maria Sitaras

MARIA SITARAS	:	SUPERIOR COURT OF NEW JERSEY
	:	MIDDLESEX COUNTY
	:	LAW DIVISION
Plaintiff,		
v.	:	DOCKET NO.
STOP & SHOP OF MONROE	:	
NEW JERSEY and/or "ABC CORPS. 1-8"	:	CIVIL ACTION
(these names being fictitious as true	:	
identities are unknown) and	:	
"JOHN DOES 1-8" (these names	:	
being fictitious as true identities are	:	
unknown)	:	
Defendants.	:	COMPLAINT AND JURY DEMAND

Plaintiff, MARIA SITARAS, residing 5A Colorado Way, in the Whiting Section of the Township of Manchester, County of Ocean, State of New Jersey, complaining against the defendants herein says:

FIRST COUNT

1. On or about August 3, 2019, plaintiff, MARIA SITARAS, was a lawful business invitee on the premises known as STOP & SHOP OF MONROE, located at 1600 Perrineville Road, in the Township of Monroe, County of Middlesex and State of New Jersey.
2. At the time and place aforesaid, defendants STOP & SHOP OF MONROE and/or

"ABC CORPORATIONS #1-3" and/or "JOHN DOES #1-3" (these names being fictitious as true identities are unknown and hereinafter referred to as "ABC CORPORATIONS #1-3" and "JOHN DOES #1-3") individually, jointly, and/or severally by and through their agents, servants and/or employees did own, control, supervise, lease and/or maintain the premises aforesaid.

3. The defendant(s) STOP & SHOP OF MONROE, and/or "ABC CORPORATIONS #1-3" and/or "JOHN DOES #1-3" were negligent in the supervision, maintenance and control of said premises.

4. As a direct and proximate consequence of the joint and several negligence of the defendants enumerated herein, MARIA SITARAS was injured when she slipped and fell on oil, causing her to sustain severe physical, mental and permanent injury and other diverse damages.

WHEREFORE, plaintiff demands judgment against defendant(s), STOP & SHOP OF MONROE and/or "JOHN DOES 1-3" and/or "ABC CORPORATIONS 1-3" jointly, severally or in the alternative for damages and costs of suit.

SECOND COUNT

1. Plaintiff repeats and reiterates each of the allegations as set forth in Count One as if same were set forth herein at length.

2. At the time and place aforesaid, defendants "JOHN DOES 4-8" (these names being fictitious as true identities are unknown and hereinafter referred to as "JOHN DOES 4-8") and/or "ABC CORPORATIONS 4-8" (these names being fictitious as true identities are unknown and hereinafter referred to as "ABC CORPORATIONS 4-8") did negligently create a hazard over which they had actual and/or constructive notice by spilling or leaving oil on the floor in the store and/or failing to remove the oil from the floor on the aforesaid premises in the course of doing business at the aforementioned STOP & SHOP OF MONROE located at 1600 Perrineville Road, in the Township of Monroe, County of Middlesex and State of New Jersey, causing plaintiff to sustain various injuries.

3. The defendants aforesaid are charged with the duty to exercise the highest possible care to protect plaintiff, MARIA SITARAS, from dangers that are known or are reasonably foreseeable including but not limited to general negligence.

4. The negligent conduct of defendants in failing to exercise the required high degree of care causing the plaintiff to be injured, have caused her to incur and in the future incur expenses for the treatment of said injuries, and will cause her great pain and suffering in the future to her great loss and damage.

WHEREFORE, plaintiff, MARIA SITARAS, demands judgment against defendants, "JOHN DOES 4-8" and/or "ABC CORPORATIONS 4-8" individually, jointly, severally or in the alternative for damages and costs of suit.

JURY DEMAND

Plaintiff demands a trial by jury on all issues.

CERTIFICATION PER R. 4:5-1

I hereby certify, R.1:4-4(b) that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding and none are contemplated.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false I am subject to punishment.

DESIGNATION OF TRIAL COUNSEL PURSUANT TO RULE 4:25-4

James M. Curran, Esquire, attorney for the aforementioned plaintiff, is hereby designated as trial counsel in the within matter.

LAW OFFICE OF JAMES M. CURRAN

JAMES M. CURRAN, ESQUIRE
Attorney for Plaintiff, MARIA SITARAS

Dated: July 22, 2021



MARIA SITARAS

Plaintiff

20210726133713

vs

Superior Court Of New Jersey

STOP & SHOP OF MONROE NEW JERSEY, ET AL

Defendant

MIDDLESEX Venue

Docket Number: MID L 4341 21

Person to be served (Name and Address):STOP & SHOP OF MONROE NEW JERSEY
1600 PERRINEVILLE ROAD
MONROE TWP. NJ 08831**By serving:** STOP & SHOP OF MONROE NEW JERSEY**Attorney:** JAMES M. CURRAN, ESQ.**Papers Served:** SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT
NOTICE, CERTIFICATION,**AFFIDAVIT OF SERVICE**

(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$ _____.

Service Data: ☒ Served Successfully ☐ Not ServedDate/Time: 7/27/2021 1:18 PM☐ Delivered a copy to him/her personally☐ Left a copy with a competent household member over 14 years of age residing therein (indicate name & relationship at right)☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (indicate name & official title at right)

Name of Person Served and relationship/title:

KARA KLINGENSMITHPERSON AUTHORIZED TO ACCEPT SERVICE**Description of Person Accepting Service:**SEX: F AGE: 36-50 HEIGHT: 5'4"-5'8" WEIGHT: 131-160 LBS. SKIN: WHITE HAIR: BROWN OTHER: _____**Unserved:**

- ☐
- Defendant is unknown at the address furnished by the attorney
-
- ☐
- All reasonable inquiries suggest defendant moved to an undetermined address
-
- ☐
- No such street in municipality
-
- ☐
- Defendant is evading service
-
- ☐
- Appears vacant

☐ No response on: Date/Time: _____
Date/Time: _____
Date/Time: _____

Other:

To Be Used Where Electronic Signature Not Available**Served Data:**

Subscribed and Sworn to me this

_____ day of _____, 20 _____

Notary Signature: _____

Name of Notary _____ Commission Expiration _____

DocuSign Court Approved E-SignatureI, DAVID FILARSKI,

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

DAVID FILARSKI

Signature of Process Server

07/27/2021

Date

Name of Private Server: DAVID FILARSKI Address: 2009 Morris Avenue UNION, NJ 07083 Phone: (800) 672-1952

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

DISMISSAL NOTICE

TELEPHONE - (732) 645-4300 EXT. 88371, AMANDA TOTI TEAM 003
COURT HOURS: 8:30 AM - 4:30 PM

DATE: DECEMBER 31, 2021
RE: SITARAS MARIA VS STOP & SHOP OF MONRO E NEW JER
DOCKET: MID L -004341 21
PARTY: STOP & SHOP OF MONRO

PLEASE TAKE NOTICE THAT ON MARCH 01, 2022 (60 DAYS FROM DATE OF
THIS NOTICE), THE COURT WILL DISMISS THE ABOVE PARTY OR PARTIES FOR LACK OF
PROSECUTION WITHOUT PREJUDICE, PURSUANT TO RULE 1:13-7 OR RULE 4:43-2 UNLESS ACTION
REQUIRED UNDER THE ABOVE RULES IS TAKEN.

HON ALBERTO RIVAS

JUDGE

ATT: JAMES M. CURRAN
JAMES M. CURRAN
86 WASHINGTON AVENUE
MILLTOWN NJ 08850